

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	Case Number 1:23cr00583
	)	
Plaintiff,	)	Judge J. Phillip Calabrese
	)	
v.	)	
	)	
PATRICIA BONCHEK,	)	<b><u>MOTION TO CONTINUE</u></b>
	)	<b><u>STATUS HEARING</u></b>
Defendant,	)	

Now comes the Defendant, Patricia Bonchek, by and through her Attorney Kevin Cafferkey, who respectfully asks this Honorable Court to continue the October 31, 2024 in-person Status Conference. The Government has provided Defense Counsel with a guideline calculation letter. Defense Counsel has shared it with the Defendant, Ms. Bonchek. Defense Counsel and the Defendant are requesting more time to review and understand the calculations. There are a number of specific offense characteristics that increase the sentencing range.

Moreover, Defense Counsel would like to meet with AUSA Stephanie Wojtasik in order to discuss a resolution in this matter and the application of the specific offense characteristics to the guidelines. However, Defense Counsel has two trials set for October 30, 2024 and one trial set for November 5, 2024 and is requesting a 3-week continuance of the Status Hearing. Defense Counsel has spoken with AUSA Stephanie Wojtasik and she has no objection to this continuance. Defense Counsel believes there is a strong possibility he will be able to resolve this case without a trial. This request is made in the interest of justice and not for needless delay.

Respectfully submitted

/s/Kevin M. Cafferkey

Kevin M. Cafferkey, Esq. (0031470)  
Attorney for Defendant, Patricia Bonchek  
55 Public Square, Suite 2100  
Cleveland, Ohio 44113  
(440) 221-4674; Fax (216) 696-1718  
Email: kmcafferkey@hotmail.com

#### CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Kevin M. Cafferkey

Kevin M. Cafferkey, Esq. (0031470)  
Attorney for Defendant, Patricia Bonchek